**TECHNICAL AND OPERATIONAL NOTE ON CHANGE MANAGEMENT OF GAMBLING TECHNICAL SYSTEMS AND APPROVAL OF THE SUBSTANTIAL CHANGES TO CRITICAL COMPONENTS (version 5).**

## 1. Document objective

This note presents a help guide for the fulfilment of the obligations in the management of changes and authorisation of the substantial changes, associated procedures and documentation to be presented in the authorisation requests. A guide on assessment criteria is also included to determine whether certain changes are substantial or not.

There are three procedures:

- Substantial change authorisation
- Substantial change authorisation in the event of extraordinary emergency
- Quarterly Report on changes

## 2. Document control

| Date | Version | Description |
|---|---|---|
| **01/04/2013** | 1.0 | Initial version. |
| **15/06/2016** | 2.0 | Updating references to the regulations.<br>Electronic management of procedures.<br>Changes in the assessment criteria for the "substantial" consideration of a change in Section 9: "Annex I. Assessment criteria for the 'substantial' consideration of a change in the technical gambling system". |
| **11/07/2017** | 3.0 | New type of substantial change of security: modification of the scheme for authentication of the participants in the technical gambling system. (Annex I, point 2, page 13) |
| **15/11/2019** | 4.0 | Changes to "Annex I. Assessment criteria for the "substantial" consideration of a change in the technical gambling system" in relation to the marketing of games and changes in the CPD for providers without a licence that had previously been approved by the DGOJ. |
| **13/05/2021** | 5.0 | Changes in Section 6: Extraordinary Emergency Change. |

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## 4. Regulations and abbreviations

Article 16 of ***Law 13/2011****, of 27 May on gambling regulation*, establishes the need for authorisation of technical gambling systems.

***Royal Decree 1613/2011****, of 14 November, implementing Law 13/2011, of 27 May*, Article 8, refers to the need to authorise any substantial modification affecting a critical component, understanding as critical the elements that refer to the random number generator, the user register and the gambling account, the internal control system, the connections with the Directorate General for the Regulation of Gambling or the processing of payments.

***Resolution of 6 October 2014,*** *approving the provision which elaborates on the technical specifications for gambling, traceability and security that must be met by the non-reserved technical gambling systems licensed under Law 13/2011 of 27 May on gambling regulation* (**RES_TEC**) establishes the obligations regarding the management of changes.

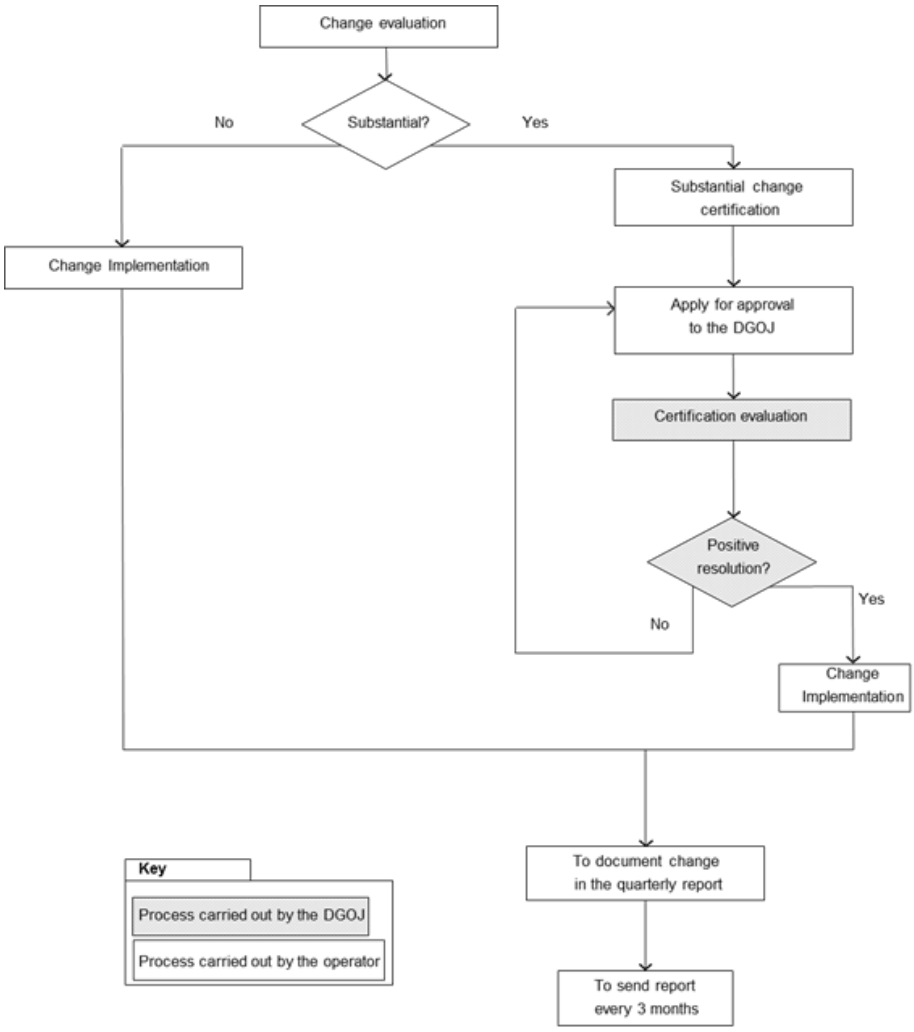
***Resolution of 6 October 2014****, approving the provision establishing the form and content of the final certification report on the technical systems of gambling operators and the change management procedure* (**RES_CERT**) sets forth in its article ten the requirements that the management of changes process must fulfil.

The purpose of this document is to analyse from a technical and operational point of view the obligations regarding the management of changes derived from the previous regulation.

## 5. Management of substantial changes to the technical gambling system

Management of changes in the technical gambling system is an inherent part of the life cycle of an information system. The operator must have a formal process for the internal approval of all changes, from the request for the change to its approval by the relevant managers. Compliance obligations for the management of changes are part of this formal process.

The purpose of the following diagram is to graphically summarise those phases of the management of changes procedure in which the obligations established by the DGOJ must be considered[1].




[1] To facilitate its reading, the diagram does not reflect the case of extraordinary emergency change that affects security, which is explained later in section 6.

**Change analysis**

In the analysis phase the operator has to evaluate whether the change is of a "substantial" nature or not.

The assessment of whether a change is "substantial" is the responsibility of the operator, who is the most knowledgeable about their own system. A guide on the assessment criteria to be used to determine the substance of a change is presented in Annex I to this document. This evaluation can be conducted in two cases:

a) In the event that, in the opinion of the operator and when justified, it is concluded that the change is not substantial, the operator can make the change without having to issue a communication to the DGOJ or submit the change for prior authorisation.

b) In the event that in the opinion of the operator and when justified, it is concluded that the change is substantial, the operator must certify the change.

In any case, change requests and the decisions taken in this regard must be recorded and they may be subject to a subsequent audit. If the DGOJ deems a change previously made to the critical components is of a substantial nature, it shall require the operator to undergo the certification process for the change, without prejudice to the possibility of requiring said change to be undone until the relevant certification is obtained.

**Certification of substantial changes**

The introduction of a substantial change requires the prior certification of the system to be changed. ***In order to prepare the certification reports for a technical gambling system for the purpose of a substantial change, it shall be necessary to use as a reference point the guidelines and report templates of Resolution of 6 October 2014,*** *approving the provision which establishes the form and content of the final certification report on the technical systems of gambling operators and elaborates on the change management procedure*, with the considerations explained in Annex II of this document.

**Request authorisation from the DGOJ**

The request for authorisation of a substantial change shall be made through the electronic office of the DGOJ. If the change affects several licences, a single request for all the licences can be made.

The corresponding form has been made available in the section:

***Electronic Procedures and Services / For the operator / licences / Request for substantial change in the technical gambling system***

The processing of the procedure will be done entirely by electronic means and it will not be necessary to use in-person registration for any procedure. Paper executive summaries signed by the person authorised in the certifying body may be kept by the operator at the disposal of the DGOJ, which may request them if necessary.

**Evaluate certification**

The DGOJ has a period of one month from the submission of the request to resolve it.

**Execute a substantial change**

The operator must not introduce the substantial change until it obtains the authorisation of the DGOJ, either express or through administrative silence.

**Execute a non-substantial change**

In the event that after the evaluation of the change by the operator, it is determined that the change is not substantial, the change can be executed, without the need to notify the DGOJ.

In relation to all software versions used in the technical system over the last four years, the operator must store copies of the binary files of the software elements. These copies may be subject to further audits.

**Document change in the quarterly report**

Any changes that are executed on a critical element must be documented in a report that will be sent quarterly to the DGOJ. Information on the preparation and submission of the quarterly change report is detailed in section 7.

**Submission of the quarterly report**

The quarterly report will be sent through the electronic office of the DGOJ. For this purpose, section 7 explains all the information related to the submission of the quarterly change report.

## 6. Extraordinary emergency change

Resolution of 6 October 2014, from the Directorate General for the Regulation of Gambling, approving the regulation setting forth the form and content of the final certification report on the technical systems of gambling operators and elaborates on the change management procedure, establishes the possibility of the operator introducing substantial changes in critical components and subsequently requesting authorisation in extraordinary emergency situations that affect security.

This procedure must respond to exceptional cases. Based on experience gained since the beginning of the regulated market in June 2012, this Directorate General considers that the extraordinary emergency change procedure must satisfy the following questions:

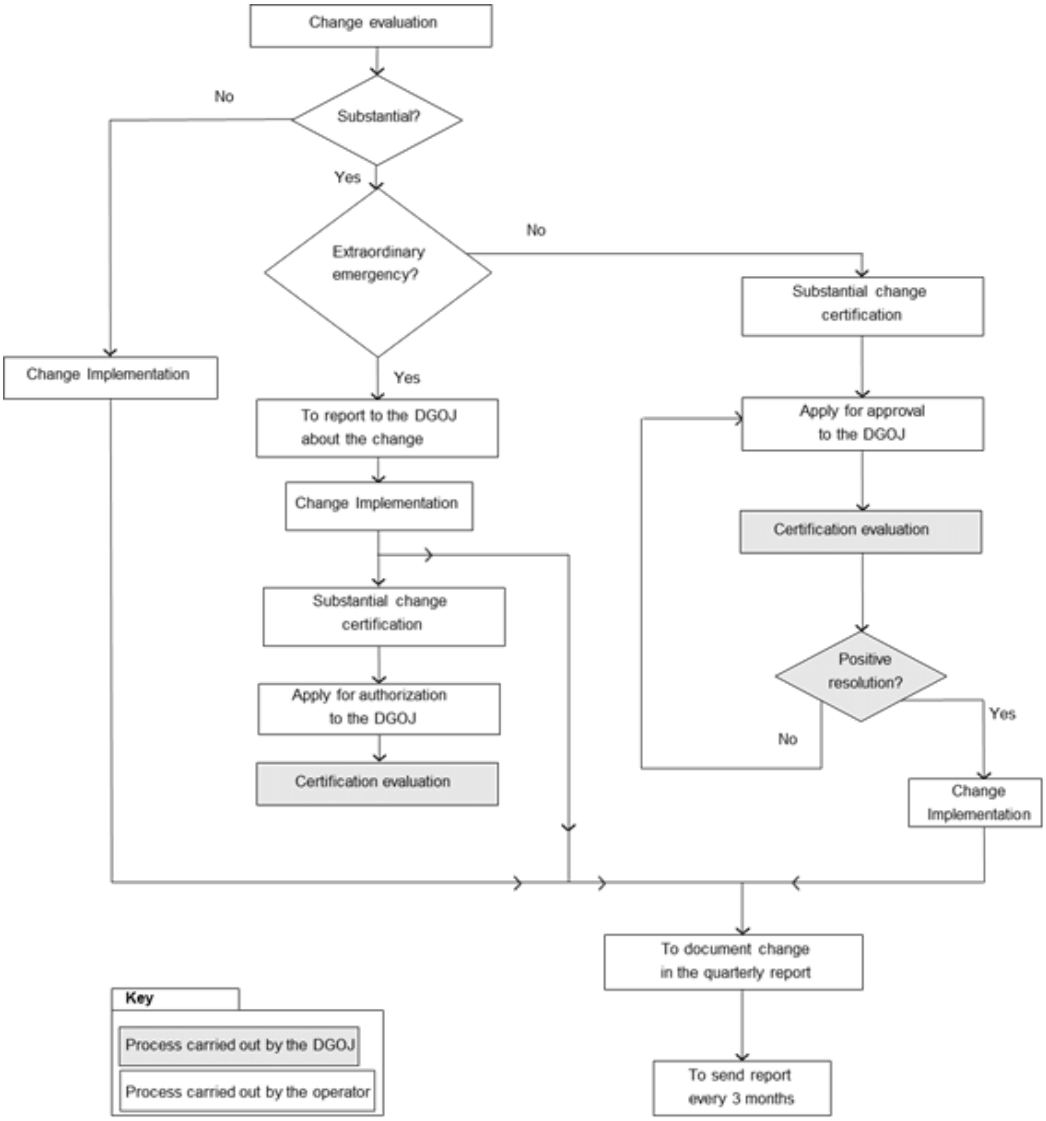
The change must be due to a security breach in a particular operator or provider in which information security has been compromised. It must also be proven that any delay in taking corrective actions would cause the impact of the incident to be greater, increase the scale of the compromised information and be detrimental to the protection of information and, therefore, the protection of gamblers.

For example, an extraordinary emergency change may be due to improper access to information that has led to information being stolen, such as gambler passwords, and which puts the integrity of the information and the gambler authentication process itself at risk.

Conversely, a security breach where the impact is limited to the unavailability of the service or its temporary interruption – without compromising the integrity or confidentiality of information – is not considered an extraordinary emergency change. Similarly, changes driven by the operator's needs and their business plan related to continuity of service, but not related to reduced gambler protection, are not considered extraordinary emergency changes.

In any case, as it is an exceptional procedure and as information security and the appearance of new threats are dynamic and ever changing, the DGOJ will keep this section updated with scenarios that may arise and that may be included in this procedure.

The following diagram shows the management of changes process when dealing with a substantial change due to an extraordinary emergency.




The instructions for each process are the same as those already explained in section 5 of this document, with the following qualifications.

## Communicate the change to the DGOJ

Extraordinary emergency change communications will be submitted through the electronic office of the DGOJ or through the electronic mailbox dgoj.control@hacienda.gob.es

To submit the communication through the office, a form has been made available in the section:

***Electronic Procedures and Services / For the operator / Licences / Communication of a substantial change in the technical gambling system due to an extraordinary emergency***

If the communication is submitted by e-mail, an e-mail with the following information must be sent:

To: dgoj.control@hacienda.gob.es

E-mail subject: **"CHANGE DUE TO EXTRAORDINARY EMERGENCY" / "OPERATOR NAME"**

E-mail body:

- Operator's identity.
- Licence identifier.
- Identity of the person who issues the communication.
- Description of the extraordinary emergency situation, indicating the risks.
- Description of the emergency corrective measures that are to be carried out or have been carried out.

The first communication must be made in Spanish or English within 48 hours after the security incident.

The operator must send subsequent communications to the DGOJ as further information is gathered on the events that occurred, the source of the incident and the impact on information security.

**Certification of the substantial change**

Once the causes and impact of the incident have been clarified and the pertinent measures adopted, the operator will firstly certify the technical gambling system and then request authorisation for the substantial change in the technical gambling system due to an extraordinary emergency. The deadline for requesting authorisation and attaching the certification reports will be three months from the first communication to the DGOJ regarding the extraordinary emergency.

The request must be include the following documentation:

- An operator report that – at a minimum – includes the following issues:
  - Justification of the exceptional circumstances that gave rise to the change due to an extraordinary emergency.
  - Source of the incident.
  - Impact of the incident. Type and volume of information affected, infrastructures affected, number of gamblers, etc.
  - Corrective action plan: actions taken to correct the impact of the incident.
  - Remediation plan: actions taken to protect the system against new incidents.
  - Communications made to gamblers.
  - Communications made to other entities: National or international state security forces, data protection agencies, etc.
  - Schedule that includes the main events related to the incidents: date the incident occurred, date of interruption and resumption of activity on the website, etc.
- A penetration test and a vulnerability analysis.
- A security certification report, issued by an entity appointed for this purpose, with the following scope: The security of the technical gambling system must be certified, based on a certification body's assessment of the incident that occurred and the corrective actions implemented. The certification must include all security areas affected by the incident and the corrective actions.
- Where the corrective actions involve a major software update of critical components (gambling platform, internal control system or gambling software), a functionality certification report must be provided, issued by an entity appointed for this purpose, certifying the new software version.

- All documentation that may be of interest, that has been generated as a result of the incident, such as security consultations performed, risk analysis, etc.

The request must be made through the electronic office of the DGOJ for the telematic processing through the form in the section:

***Electronic Procedures and Services / For the operator / Licences / Request for a substantial change in the technical gambling system due to an extraordinary emergency***

The processing of the procedure will be done entirely by electronic means and it will not be necessary to use in-person registration for any procedure. Paper executive summaries signed by the person authorised in the certifying body may be kept by the operator at the disposal of the DGOJ, which may request them if necessary.

## 7. Quarterly Report on changes

Any changes that are executed on a critical element must be documented in a report that will be sent quarterly to the DGOJ.

The quarterly report is the list of changes made to critical components. For each change the following must be included:

- An identifier of the change, the date of execution.
- A conceptual and qualitative description of the change. The reason for the change, the critical components on which it has an impact, and the purpose of its implementation must be explained.
- Reasoned description of the change as substantial or non-substantial.
- Binaries should not be included and it is not required to include a fingerprint or hash of the deployed versions.
- Those changes that are of the same nature or that are governed by the same reason can be abstracted or grouped.

A single report may be drawn up per operator or several. In the latter case the criteria of the division will be described.

The format of the quarterly report may be one or more text documents or tables, written in Spanish or English.

An example report format might be as follows:

**CONTENTS OF THE REPORT**

1. Substantial changes made by extraordinary emergency.
2. Substantial changes made with prior authorisation of the DGOJ.
3. Non-substantial changes in which the criterion of the operator deviates from the criterion of the DGOJ for the classification of the change as non-substantial (according to Annex I).
4. Non-substantial changes in which the criterion of the operator matches the criterion of the DGOJ for the classification of the change as non-substantial (according to Annex I).

For each of the sections indicated above, indicate:

| Change identifier | Date of execution | Conceptual description* | Proof for non-substantial changes** |
|---|---|---|---|
| | | | |
| | | | |
| | | | |

* In cases where there is a change in software version of one of the critical elements, indicate the identifier of the version to which it is migrated, in the conceptual description.

** The justification is especially necessary in cases where the operator's criterion deviates from the general criteria of the DGOJ in Annex I.

The quarterly report is sent through the electronic office of the DGOJ, through the forms in the section:

***Electronic Procedures and Services / For operators / Mandatory reports / Regular information***

In the process there is a first form of identification and a second form that allows the following to be attached:

- Quarterly Report on changes
- Operator's descriptive questionnaire[2]

The quarterly report must be sent on the following dates:

- First Report: relating to the months of January, February and March.
  *Delivery period: from 1 to 10 May.*
- Second Report: relating to the months of April, May and June.
  *Delivery period: from 1 to 10 August.*
- Third Report: relating to the months of July, August and September.
  *Delivery period: from 1 to 10 November.*
- Fourth Report: relating to the months of October, November and December.
  *Delivery period: from 1 to 10 February.*

[2] It is essential that in the "LS Other Games" tab (or, where applicable, "LS Bets" or "LS Contests") of the operator descriptive questionnaire, the game offer of the B2C operator is clearly described. For this, the name of the game, the name of the provider, the available access technology and the start date of the marketing of the game must be included. In order to include this information, a version of the questionnaire was published in 2016 July, in which only the last three tabs related to the game offer were modified.

## 8. DGOJ Enquiry service

Any doubts or queries about the procedure or about the substantial nature of a change will be addressed through the e-mail address dgoj.control@hacienda.gob.es.

To: dgoj.control@hacienda.gob.es

Subject: “MANAGEMENT OF CHANGES ENQUIRY” and a heading for the enquiry.

E-mail body:

- Identity of the operator/s or certification entity/entities on behalf of which the enquiry is made.
- Enquirer's identity.
- Enquiry.

Since the decision on the substance of a change requires a thorough knowledge of the system and a prior risk analysis, the DGOJ's response may consist of general conceptual guidelines and recommendations that assist the operator in making the final decision. The operator must provide sufficient information in the enquiry to allow the extent of changes to be assessed in relation to each critical component.

Enquiries and questions will be answered in Spanish or, if possible, English.

**"ANNEX I. VALUATION CRITERIA FOR THE 'SUBSTANTIAL' CONSIDERATION OF A CHANGE IN THE TECHNICAL GAMBLING SYSTEM".**

The description of a change as "substantial" must be based on a proportionality criterion between the evaluation of the risks associated with the change, the necessary flexibility of a constantly evolving market and the cost that each certification process represents for the operators and for the Administration. The risks associated with not making a change should also be assessed.

Regulatory risks should be assessed by reference to the objectives of Law 13/2011, of 27 May on gambling regulation, assessing among others:

- the impact on the control of subjective bans,
- responsible gambling,
- the compatibility of the gambling offer with regulated games,
- fair gambling and its correct functioning,
- the authenticity and correct calculation of bets,
- the traceability of the operations carried out,
- monitoring by the Directorate General for the Regulation of Gambling through the Internal Control System,
- the security of the games and especially in the access of the participant,
- the recovery of data in the event of any incident.

Technical gambling systems are very complex. The dependencies between the hardware, software and network elements that make up the central gambling unit and the coupling that may exist between their different software components complicate the definition of substantial change with respect to the elements classified as critical. This makes it very difficult to list all the types of changes that can arise and to assess their impact and scope in each specific technical system.

Therefore, the first assessment as to whether a change should be qualified as "substantial" corresponds to the operator themselves as they know most about their technical system.

It is important to keep in mind that the technical complexity of a change is not directly related to the risk associated with the change from the point of view of regulatory compliance. For example, a change in the parameters of the games will not be considered a substantial change but their introduction could represent a breach of the requirements and limitations of the games. A change in the graphical interface will not normally be considered a substantial change but its introduction could imply a breach of the information obligations to the player.

Although the decision to assess whether a change by the operator is substantial or not, the DGOJ ensures that all operators follow similar assessment criteria that meet the objectives of regulations and are proportionate. In this context, the DGOJ's criterion is then developed in the classification of a change as "substantial" in certain cases, without prejudice to the fact that the criterion of the operator may deviate from this recommendation, in which case it will be reported on in the quarterly report on changes.

The criterion of the DGOJ is updated as situations or examples of interest are presented to several operators and to adapt to the rapid technological evolution of the sector. Thus, after the initial authorisation of the new licences granted in June 2015, the market demands constant expansion and updating of its gambling offer, especially of slot machines. After analysing the situation, the main risks have been identified in the incorporation of new games in three areas: integration between the different software components, the correct functioning of the session aimed at slot machine games and the correct operation of the games. In this scenario it is possible to define in which cases the incorporation of a new game or a new access technology constitutes a substantial change and therefore must be previously authorised. This significantly reduces the loads for the operators and for the DGOJ and the introduction of new games and new access technologies is accelerated, responding to a demand of the sector without reduction of the guarantees on the authorisation security.

The new management framework for changes in the cases of incorporation of new games or new access technologies is as follows:

- It will be necessary to certify the integration of each B2C operator with the different platforms of each of its providers (mobile, PC, etc.), but the specific certification of each of the games and of each of the available access technologies will be carried out only by the provider.

- From an operational standpoint, B2C operators who wish add new games to the gambling on offer do not need a substantial change request from the DGOJ if the integration of the B2C operator with the provider has already been authorised and the games have previously been authorised by the DGOJ:

  a) either because the provider has a licence and the games have been authorised,
  b) or because another B2C operator previously authorised the games under identical conditions and based on the same documentation available to the B2C that wishes to launch the new games. To make this possible, every time an operator requests authorisation of a game from an unlicensed provider, the DGOJ will issue a "provider technical report" attached to the substantial change resolution. This report will reference the name of the game, all characteristics considered relevant to describe the game (for example, the provider, the servers on which it is installed, the version, access technologies, etc.) and the fact that it has been authorised by the DGOJ on a particular date. This technical report has a CSV code that allows any operator who knows it to validate the authenticity of the document. The operator can pass this document to their provider, and the provider can distribute this document to their customers. This allows operators who have previously authorised their integration with the provider, and who have the gambling certification reports and the "provider technical report" issued by the DGOJ accrediting that the game has been authorised, to launch the game directly into production, as they are certain that it has been authorised.

  In any case, each operator is responsible for marketing games that have been duly approved:
  a) because they have them approved under their own licence,
  b) or because they have been approved by their supplier through their licence,
  c) or because they has a "provider technical report" issued by the DGOJ that approves the games on the same conditions on which they are going to be marketed.

- As a consequence of this change in the change management procedure it is necessary for each operator to report through the descriptive questionnaire of the operator of their gambling offer, including the name of the game, the name of the provider, the available access technology and the date on which the game started being marketed. In order to facilitate this communication, a new version of the questionnaire was published in july 2016 which only the last three tabs related to the gambling offer have been modified to include this information.

In a similar manner to new games, every time an operator requests security authorisation of a new CPD from an unlicensed provider, the DGOJ will issue a "provider technical report" attached to the substantial change resolution. This report will reference the CPD of the new provider and any issues that are relevant to the authorisation. This technical report has a CSV code that allows any operator who knows it to validate the authenticity of the document. The operator can pass this document to their provider, and the provider can distribute this document to their customers. This allows operators who have previously authorised their integration with the provider, and who have the CPD certification reports and the "provider technical report" issued by the DGOJ accrediting that the CPD has been authorised, to operate from the new CPD, as they have guarantees that the CPD has been authorised.

**The change scenarios analysed are classified into the following groups:**

- Substantial security changes
- Substantial changes related to user registration
- Substantial changes related to the gambling account
- Substantial changes related to gambling software

- Changes that may NOT be substantial

**Substantial security changes**

1. The incorporation of a new DPC and its transfer to a location other than the existing ones represent a substantial change It is not necessary to request a substantial change where the new CPD has previously been approved by the DGOJ,
    a) because it has been approved by their provider through their licence,
    b) or because another B2C operator previously authorised the CPD under identical conditions and based on the same documentation available to the B2C that wishes to begin operations from the new CPD.

2. The modification of the scheme for authentication of the participants in the technical gambling system or the implementation of a new authentication method when communicating with the participants represent a substantial change.

**Substantial changes related to user registration**

3. There is a substantial change in the procedures for verifying the identity of users, processing responses, checking logic and activating users.

Examples:

- Changes in the enquiries submitted to the RGIAJ (General Register of Gambling Access Bans)
- Changes to queries to the Player Verification Web Service.

**Substantial changes related to the gambling account**

4. Changes in the mode of integration with game providers.

5. Complete change of the payment gateway.

**Substantial changes related to gambling software**

6. A major change to the version of the previously approved gambling software.

7. Incorporation of a new game software provider.

8. Change in the model for integration of the operator with the gambling software provider. If there are several types of integration, all of them must be certified. For example, if there is integration with the PC platform and integration with the mobile platform, it will be necessary to certify the correct integration of the operator with its provider in all cases.

9. The addition of a new game that has not previously been approved by the DGOJ on the same conditions on which it will be marketed.

10. Change in games or variants of approved games, when they involve the deployment of new software components critical to the correct carrying out of the game. It will not be necessary to certify game variants when the changes are limited to the parameterisation of the already certified change.

11. The launching of new gambling access technologies.

12. In the case of sports betting, the inclusion of live betting.

13. Changes that modify the generation of random numbers and the processing of this information.

**Changes that may NOT be substantial**

Changes related to functionality that may not be substantial:

14. General purpose systems that have already been previously authorised, or changes to them that do not involve an alteration of the logic of critical components:

    - General purpose software: operating systems, development libraries, database, web server, application server, etc.
    - Network or wiring elements.
    - Hardware equipment.

15. Changes made to critical component software:

    - Corrective maintenance, correction of errors or bugs.
    - Changes that affect performance only.
    - Changes that implement promotional or loyalty policies, provided they do not involve large changes in the gambling account and which guarantee the traceability of operations.

16. Changes in the sources of documentary information used for the accreditation of the veracity of the data associated to the user register.

17. Inclusion of new payment methods in the previously authorised payment gateway.

18. Changes in the web interface.

19. For a B2C operator, adding new games is not considered substantial if they have been previously approved by the DGOJ on the same conditions on which they are to be marketed and based on the same documentation available to the B2C that wishes to start marketing the new games.

20. The parameterisation of previously approved games provided it does not involve the deployment of new software components critical to the operation of the game.

Changes related to security that may not be substantial:

Security should be understood as an iterative and incremental process. The incorporation of new elements or changes in the technical gambling system must be carried out within the framework of the operator's information security management, but will not necessarily be subject to further certification.

21. Changes in policies, processes, procedures or technical or organisational measures, provided they do not cause impairment or loss of guarantees vis-a-vis those previously approved.

22. Security related to new technologies or participant access applications (for example, smartphone applications) must be subject to operator-defined controls and will be subject to the "penetration testing and vulnerability analysis" set out in the regulations. The correct management of security must be demonstrated through the biennial audit reports.

## ANNEX II. CONSIDERATIONS TO BE TAKEN INTO ACCOUNT IN THE PREPARATION OF CERTIFICATION REPORTS ON A SUBSTANTIAL CHANGE

The introduction of a substantial change requires the prior certification of the system to be changed. In order to prepare the certification reports for a technical gambling system due to substantial changes, it shall be necessary to use as a reference point the guidelines and report templates of ***Resolution of 6 October 2014,*** *approving the provision which establishes the form and content of the final certification report on the technical systems of gambling operators and elaborates on the management of changes procedure*, with the following considerations:

### Description of the technical system to be changed.

In the request for a substantial change, an updated description of the technical system, the particular rules in the case of specific licences and the operator's descriptive questionnaire must be provided.

### Functional report. Integration tests

In the certification prior to change, it is not an essential requirement to perform tests in the environment actually used to market the game. When the certification is required prior to the start of production, the tests can be performed in a pre-production environment.

The certifying body must, under its own responsibility, certify that the results obtained in the test environment are comparable to the results that would have been obtained in testing the technical gambling system employed by the operator for carrying out and operating the licensed gambling. It must further certify that it has examined that any possible differences between the test environment and the actual technical gambling system do not affect the quality of the test results.

In the case of integration tests on the internal control system (A.5.1 and B.4.1), the tests shall be carried out with fictitious data as closely as possible, taking into account any considerations deemed appropriate. Testing with actual data will not be necessary.

### Scope of certification reports and documentation to be provided

The scope of the requested certification must be the whole of the licence subject to the change. That is, the certification process conducted by the certifying body must be approached with a global vision of the licence to be changed.

In this regard, if it is reasonably understood that the change affects only part of the system, it may be possible to reuse documentation, certification reports or tests carried out for the authorisation process, <u>stating it in a reasoned way in the new documentation provided for certification.</u>

Some examples of reuse are as follows:

1. Change that exclusively affects functionality or security.

   The certifying body, under its responsibility, can assess the scope of the changes and decide that a change affects only functionality and not security.

**In this case, the certifying body must provide a signed statement certifying that the change does not affect security and that the security report previously issued may be reused. The report code, date of issue, certifying entity and scope of the reused security report must be indicated.**

The certifying body, under its responsibility, can assess the scope of the changes and decide that a change affects only security and not functionality.

**In this case, the certifying body must provide a signed statement certifying that the change does not affect functionality and that the functionality report previously issued may be reused. The report code, date of issue, certifying entity and scope of the reused functionality report must be indicated.**

2. Change affecting only one or more of the previously submitted certification reports which have already been approved or authorised.

   The certifying body may reuse previously issued certification reports that are not affected by the change.

**In this case, the certifying body must provide a signed statement which must include:**

1. the list of complementary reports, indicating the **report code, date of issue, certifying entity and scope of the report**, relating to the same licence,
2. proof certifying that the change does not affect the rest of the certification reports submitted above, and indicating that, overall, the system under the scope of the licence is fully certified.

3. The certification reports will be complete. The certifying body shall decide on all technical requirements, integration tests and specific analyses defined. The certifying body, under its responsibility, will be able to assess the scope of the changes and not repeat the tests of those requirements that are not affected by the change, reflecting it thus in the report. In this case, the results of the tests that have been reused in the new report will be transcribed or an explicit reference to the report containing the results will be indicated for each test.

**Report on compliance with the regulations on personal data protection**

In the following cases, a new report on compliance with the regulations on personal data protection must be submitted:

1. Spanish operators subject to Spanish jurisdiction for data protection:

   i. Changes in the location of own DPCs or of providers that process personal data when the change occurs from an EU country to the rest of the world or vice versa.

2. Non-Spanish operators subject to Spanish jurisdiction for data protection:

   i. Changes in the location of own DPCs or of providers that process personal data when the change occurs from Spain to another EU country or vice versa.
   ii. Changes in the location of own DPCs or of providers that process personal data when the change occurs from an EU country to the rest of the world or vice versa.